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PETER D. ROSS (202) 429-4232

August 18, 1993

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Mr. William F. Caton Secretary Federal Communications Commission 1919 M Street, N.W. Washington, D.C. 20554 RECEIVED

'AUG 1 8 1993

FEDERAL COMMUNICATIONS COMMISSION OFFICE OF THE SECRETARY

Re: Notification of Permitted Ex Parte Presentation in MM Docket No. 92-266

Dear Mr. Caton:

Star Cable Associates, by its attorneys and pursuant to Section 1.1206(a)(1) of the Commission's Rules, hereby submits an original and two copies of the attached permitted ex parte letter to Commission officials from Mr. James C. Roddey, President and Chief Executive Officer of Star Cable Associates, regarding MM Docket No. 92-266.

Kindly direct any questions regarding this matter to the undersigned.

Respectfully submitted,

Peter D. Ross

PDR/lar Attachments

Attachments
Cc: Hon. James H. Quello
Hon. Ervin S. Duggan
Robert Corn-Revere
Maureen O'Connell
Byron Marchant
James Coltharp
John Hollar
Bruce Romanox

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

100 Greentree Commons 381 Mansfield Avenue Pittsburgh, PA 15220 Telephone (412) 937-0099 Telefax (412) 937-0145

August 11, 1993

Chairman James H. Quello Federal Communications Commission 1919 M Street, N.W. Washington, D.C. 20554

Dear Chairman Quello:

Thank you for your time on Thursday, July 29, when we presented to you our specific plan on administrative relief for small, low-density cable systems. We appreciate the Commission's willingness to meet with us on this issue and consider our plan in its final rulemakings.

As you will recall, our plan would streamline the FCC's rate regulation scheme and reduce the administrative burden on small, low-density systems (and also on the FCC) by providing for an add-on to the existing benchmarks. At most, this plan would allow current rates for these systems to remain the same; our plan would not permit a rate increase. This plan takes into account the unique costs and operations of small, low-density systems while at the same time reducing administrative burdens by eliminating the need for expensive and time-consuming cost-of-service showings. Finally, this plan is specifically designed to limit relief only where necessary to small, low-density cable operators that serve no more than 2% or 3% of the total number of cable subscribers nationwide.

Chairman James H. Quello August 11, 1993 Page Two

Thank you again for your time and consideration.

Sincerely,

James C. Roddey
President and Chief
Executive Officer

JCR/vas

cc: Michael R. Haislip
 Matthew M. Polka, Esq.
 Peter Ross, Esq.
 Donna C. Gregg, Esq.



August 11, 1993

Robert Corn-Revere, Esq. Chief Legal Advisor Office of Chairman James H. Quello Federal Communications Commission 1919 M Street, N.W. Washington, D.C. 20554

Dear Bob:

Thank you for your time on Thursday, July 29, when we presented to you our specific plan on administrative relief for small, low-density cable systems. We appreciate the Commission's willingness to meet with us on this issue and consider our plan in its final rulemakings.

As you will recall, our plan would streamline the FCC's rate regulation scheme and reduce the administrative burden on small, low-density systems (and also on the FCC) by providing for an add-on to the existing benchmarks. At most, this plan would allow current rates for these systems to remain the same; our plan would not permit a rate increase. This plan takes into account the unique costs and operations of small, low-density systems while at the same time reducing administrative burdens by eliminating the need for expensive and time-consuming cost-of-service showings. Finally, this plan is specifically designed to limit relief only where necessary to small, low-density cable operators that serve no more than 2% or 3% of the total number of cable subscribers nationwide.

Robert Corn-Revere, Esq. August 11, 1993 Page Two

Thank you again for your time and consideration.

Sincerely,

James C. Roddey
President and Chief
Executive Officer

JCR/vas

cc: Michael R. Haislip Matthew M. Polka, Esq. Peter Ross, Esq. Donna C. Gregg, Esq.



August 11, 1993

Maureen O'Connell Acting Mass Media Advisor Office of Chairman James H. Quello Federal Communications Commission 1919 M Street, N.W. Washington, D.C. 20554

## Dear Maureen:

Thank you for your time on Thursday, July 29, when we presented to you our specific plan on administrative relief for small, low-density cable systems. We appreciate the Commission's willingness to meet with us on this issue and consider our plan in its final rulemakings.

As you will recall, our plan would streamline the FCC's rate regulation scheme and reduce the administrative burden on small, low-density systems (and also on the FCC) by providing for an add-on to the existing benchmarks. At most, this plan would allow current rates for these systems to remain the same; our plan would not permit a rate increase. This plan takes into account the unique costs and operations of small, low-density systems while at the same time reducing administrative burdens by eliminating the need for expensive and time-consuming cost-of-service showings. Finally, this plan is specifically designed to limit relief only where necessary to small, low-density cable operators that serve no more than 2% or 3% of the total number of cable subscribers nationwide.

Maureen O'Connell August 11, 1993 Page Two

Thank you again for your time and consideration.

Sincerely,

James C. Roddey
President and Chief
Executive Officer

JCR/vas

CC: Michael R. Haislip
 Matthew M. Polka, Esq.
 Peter Ross, Esq.
 Donna C. Gregg, Esq.



August 11, 1993

Byron Marchant, Esq.
Senior Legal Advisor
Office of Commissioner Andrew C. Barrett
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

Dear Byron:

Thank you for your time on Thursday, July 29, when we presented to you our specific plan on administrative relief for small, low-density cable systems. We appreciate the Commission's willingness to meet with us on this issue and consider our plan in its final rulemakings.

As you will recall, our plan would streamline the FCC's rate regulation scheme and reduce the administrative burden on small, low-density systems (and also on the FCC) by providing for an add-on to the existing benchmarks. At most, this plan would allow current rates for these systems to remain the same; our plan would not permit a rate increase. This plan takes into account the unique costs and operations of small, low-density systems while at the same time reducing administrative burdens by eliminating the need for expensive and time-consuming cost-of-service showings. Finally, this plan is specifically designed to limit relief only where necessary to small, low-density cable operators that serve no more than 2% or 3% of the total number of cable subscribers nationwide.

Byron Marchant, Esq. August 11, 1993 Page Two

Thank you again for your time and consideration.

Sincerely,

James C. Roddey
President and Chief
Executive Officer

JCR/vas

cc: Michael R. Haislip Matthew M. Polka, Esq. Peter Ross, Esq. Donna C. Gregg, Esq.



August 11, 1993

James Coltharp Acting Mass Media Advisor Office of Commissioner Andrew C. Barrett Federal Communications Commission 1919 M Street, N.W. Washington, D.C. 20554

Dear Jim:

Thank you for your time on Thursday, July 29, when we presented to you our specific plan on administrative relief for small, low-density cable systems. We appreciate the Commission's willingness to meet with us on this issue and consider our plan in its final rulemakings.

As you will recall, our plan would streamline the FCC's rate regulation scheme and reduce the administrative burden on small, low-density systems (and also on the FCC) by providing for an add-on to the existing benchmarks. At most, this plan would allow current rates for these systems to remain the same; our plan would not permit a rate increase. This plan takes into account the unique costs and operations of small, low-density systems while at the same time reducing administrative burdens by eliminating the need for expensive and time-consuming cost-of-service showings. Finally, this plan is specifically designed to limit relief only where necessary to small, low-density cable operators that serve no more than 2% or 3% of the total number of cable subscribers nationwide.

James Coltharp August 11, 1993 Page Two

Thank you again for your time and consideration.

Sincerely,

James C. Roddey

President and Chief Executive Officer

JCR/vas

CC: Michael R. Haislip
 Matthew M. Polka, Esq.
 Peter Ross, Esq.
 Donna C. Gregg, Esq.



August 11, 1993

Commissioner Ervin S. Duggan Federal Communications Commission 1919 M Street, N.W. Washington, D.C. 20554

Dear Commissioner Duggan:

Thank you for your time on Thursday, July 29, when we presented to you our specific plan on administrative relief for small, low-density cable systems. We appreciate the Commission's willingness to meet with us on this issue and consider our plan in its final rulemakings.

As you will recall, our plan would streamline the FCC's rate regulation scheme and reduce the administrative burden on small, low-density systems (and also on the FCC) by providing for an add-on to the existing benchmarks. At most, this plan would allow current rates for these systems to remain the same; our plan would not permit a rate increase. This plan takes into account the unique costs and operations of small, low-density systems while at the same time reducing administrative burdens by eliminating the need for expensive and time-consuming cost-of-service showings. Finally, this plan is specifically designed to limit relief only where necessary to small, low-density cable operators that serve no more than 2% or 3% of the total number of cable subscribers nationwide.

Commissioner Ervin C. Duggan August 11, 1993 Page Two

Thank you again for your time and consideration.

Sincerely,

James C. Roddey
President and Chief
Executive Officer

JCR/vas

CC: Michael R. Haislip Matthew M. Polka, Esq. Peter Ross, Esq. Donna C. Gregg, Esq.



August 11, 1993

John C. Hollar, Esq.
Senior Legal Advisor
Office of Commissioner Ervin S. Duggan
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

Dear John:

Thank you for your time on Thursday, July 29, when we presented to you our specific plan on administrative relief for small, low-density cable systems. We appreciate the Commission's willingness to meet with us on this issue and consider our plan in its final rulemakings.

As you will recall, our plan would streamline the FCC's rate regulation scheme and reduce the administrative burden on small, low-density systems (and also on the FCC) by providing for an add-on to the existing benchmarks. At most, this plan would allow current rates for these systems to remain the same; our plan would not permit a rate increase. This plan takes into account the unique costs and operations of small, low-density systems while at the same time reducing administrative burdens by eliminating the need for expensive and time-consuming cost-of-service showings. Finally, this plan is specifically designed to limit relief only where necessary to small, low-density cable operators that serve no more than 2% or 3% of the total number of cable subscribers nationwide.

John C. Hollar, Esq. August 11, 1993 Page Two

Thank you again for your time and consideration.

Sincerely,

James C. Roddey/ President and Onief Executive Officer

JCR/vas

cc: Michael R. Haislip
 Matthew M. Polka, Esq.
 Peter Ross, Esq.
 Donna C. Gregg, Esq.



August 11, 1993

Bruce A. Romano
Deputy Chief
Policy and Rules Division
Room 8010
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

Dear Bruce:

Thank you for your time on Thursday, July 29, when we presented to you and your colleagues our specific plan on administrative relief for small, low-density cable systems. We appreciate the Commission's willingness to meet with us on this issue and consider our plan in its final rulemakings.

As you will recall, our plan would streamline the FCC's rate regulation scheme and reduce the administrative burden on small, low-density systems (and also on the FCC) by providing for an add-on to the existing benchmarks. At most, this plan would allow current rates for these systems to remain the same; our plan would not permit a rate increase. This plan takes into account the unique costs and operations of small, low-density systems while at the same time reducing administrative burdens by eliminating the need for expensive and time-consuming cost-of-service showings. Finally, this plan is specifically designed to limit relief only where necessary to small, low-density cable operators that serve no more than 2% or 3% of the total number of cable subscribers nationwide.

Bruce A. Romano August 11, 1993 Page Two

Thank you again for your time and consideration.

Sincerely,

James C. Roddey

President and chief

Executive Officer

JCR/vas

CC: Michael R. Haislip
 Matthew M. Polka, Esq.
 Peter Ross, Esq.
 Donna C. Gregg, Esq.